

EXHIBIT 16

Robbie Wright

From: Huguenard, Harris <hhuguenard@jw.com>
Sent: Thursday, April 3, 2025 9:44 AM
To: Aaron Wagner
Cc: Bernick, Mike; Alex Pierce; Kathrin Bishop; Anthony Laporte; Robbie Wright; Ben Herbert; C. Celeste Creswell; Nancy Martinez; Barake, Gabriela; Drab, Michael
Subject: RE: [External] Lamotta - NOD

Good morning, Aaron,

Thank you for your note. Anthony and I had been working on getting this deposition scheduled for some time, and you and I had not discussed this matter. We will include you and your team on future correspondence related to scheduling. While we're on the topic of who to include on email correspondence, please ensure to include Ben Herbert, Michael Drab, and Gabriela Barake, in addition to myself and Mike Bernick. Thanks in advance!

All the best,

Harris J. Huguenard | Partner
1401 McKinney, Suite 1900
Houston, TX 77010
V: (713) 752-4247 | hhuguenard@jw.com

Jackson Walker LLP

From: Aaron Wagner <awagner@kcozlaw.com>
Sent: Wednesday, April 2, 2025 12:05 PM
To: Huguenard, Harris <hhuguenard@jw.com>
Cc: Bernick, Mike <mbernick@jw.com>; Alex Pierce <APierce@hanszenlaporte.com>; Kathrin Bishop <kbishop@kcozlaw.com>; Anthony Laporte <ALaporte@hanszenlaporte.com>; Robbie Wright <rwright@kcozlaw.com>; Ben Herbert <bherbert@millerbarondess.com>; C. Celeste Creswell <ccreswell@kcozlaw.com>; Nancy Martinez <NMartinez@hanszenlaporte.com>
Subject: RE: [External] Lamotta - NOD

Caution: **External Email.

Harris,

I see below that you contacted Anthony regarding scheduling but did not include me or my office. We've also not received a response to our email of yesterday regarding extending discovery and multiple depositions which will need to be scheduled. I'll check on availability for this date and circle back, but in the meantime, please copy me and my office (Robbie Wright, Kathrin Bishop, and Celeste Creswell) on all communications related to this case, especially with respect to any scheduling matters.

Thanks,
Aaron

Aaron Wagner



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Licensed to practice law in Washington, Oregon, Maryland, Texas, Florida, Georgia, and the District of Columbia.

From: Nancy Martinez <NMartinez@hanszenlaporte.com>
Sent: Wednesday, April 2, 2025 8:57 AM
To: Huguenard, Harris <hhuguenard@jw.com>
Cc: Bernick, Mike <mbernick@jw.com>; Aaron Wagner <awagner@kcozlaw.com>; Alex Pierce <APierce@hanszenlaporte.com>; Kathrin Bishop <kbishop@kcozlaw.com>; Anthony Laporte <ALaporte@hanszenlaporte.com>; Robbie Wright <rwright@kcozlaw.com>; Ben Herbert <bherbert@millerbarondess.com>
Subject: RE: [External] Lamotta - NOD

Good morning, Mr. Huguenard:

Attached please find Mr. Lamotta's notice of deposition.

Best,

Nancy Martinez

Paralegal

nmartinez@hanszenlaporte.com hanszenlaporte.com
p: 713-522-9444 f: 713-524-2580
14201 Memorial Drive, Houston, Texas 77079

C E L E B R A T I N G 25 Y E A R S

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From: Anthony Laporte <ALaporte@hanszenlaporte.com>
Sent: Tuesday, April 1, 2025 9:30 PM
To: Huguenard, Harris <hhuguenard@jw.com>
Cc: Bernick, Mike <mbernick@jw.com>; Nancy Martinez <NMartinez@hanszenlaporte.com>; Aaron Wagner <awagner@kcozlaw.com>; Alex Pierce <APierce@hanszenlaporte.com>; Kathrin Bishop <kbishop@kcozlaw.com>
Subject: RE: [External] Lamotta

Harris,

Let's take the 8th.

Thank you.

Anthony

Anthony L. Laporte
Hanszen Laporte
Board Certified in Civil Trial Law
ABOTA Member
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From: Huguenard, Harris <hhuguenard@jw.com>
Sent: Tuesday, April 1, 2025 9:25 PM
To: Anthony Laporte <ALaporte@hanszenlaporte.com>
Cc: Bernick, Mike <mbernick@jw.com>
Subject: [External] Lamotta

Ryan is available May 8th or 9th. Do either of those dates work for you?

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